

# EXHIBIT B

## Danielle Pierre

---

**From:** Danielle Pierre  
**Sent:** Tuesday, November 24, 2020 6:29 PM  
**To:** 'Sheldon Gopstein'  
**Cc:** aekstein@dbsnynj.com; sposen@dbsnynj.com; Dafney Stokes; Tabitha Luc  
**Subject:** RE: KeyBank v. Direct Building  
**Attachments:** 28 Order for Default Judgment .pdf; 1 NJ Domesticated Judgment.pdf

**Follow Up Flag:** Follow up  
**Due By:** Friday, December 4, 2020 3:30 PM  
**Flag Status:** Flagged

Thank you.

Please find attached a copy of the Judgment entered in New York and later domesticated to New Jersey.

Best,  
Danielle



Danielle Pierre | Associate | Wong Fleming

---

821 Alexander Road, Suite 200 | Princeton, NJ 08540  
Phone: 609.951.9520 | Fax: 609.951.0270

---

[www.wongfleming.com](http://www.wongfleming.com)

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (a) avoiding penalties under the Internal Revenue Code or (b) promoting, marketing or recommending to another party any transaction or matter addressed herein.

THIS ELECTRONIC MAIL TRANSMISSION AND ANY ATTACHMENTS MAY CONTAIN PRIVILEGED, CONFIDENTIAL, OR PROPRIETARY INFORMATION INTENDED ONLY FOR THE PERSON(S) NAMED. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT OR THE AUTHORIZED REPRESENTATIVE OF THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISTRIBUTION, COPYING, OR DISCLOSURE OF THIS COMMUNICATION IS STRICTLY PROHIBITED

---

**From:** Sheldon Gopstein <sg@gopsteinlaw.com>  
**Sent:** Tuesday, November 24, 2020 1:25 PM  
**To:** Danielle Pierre <DPierre@wongfleming.com>  
**Cc:** aekstein@dbsnynj.com; sposen@dbsnynj.com; Dafney Stokes <dstokes@wongfleming.com>; Tabitha Luc <tluc@wongfleming.com>  
**Subject:** RE: KeyBank v. Direct Building

Yes I represent Direct Building Products. Let me review with the client and get back to you next week. Meanwhile kindly forward copies of the judgment(s) you are referencing. Thank you.

**Sheldon Gopstein**  
**Law Office of Sheldon H. Gopstein, Esq.**  
**2 Park Avenue, 20<sup>th</sup> Floor**  
**New York, NY 10016**  
**tel. (212) 363-2400**  
**fax (212) 363-3313**  
**email: [sg@gopsteinlaw.com](mailto:sg@gopsteinlaw.com)**  
**website: [www.gopsteinlaw.com](http://www.gopsteinlaw.com)**

---

**From:** Danielle Pierre <[DPierre@wongfleming.com](mailto:DPierre@wongfleming.com)>  
**Sent:** Tuesday, November 24, 2020 9:59 AM  
**To:** Sheldon Gopstein <[sg@gopsteinlaw.com](mailto:sg@gopsteinlaw.com)>  
**Cc:** [aeinstein@dbsnynj.com](mailto:aeinstein@dbsnynj.com); [sposen@dbsnynj.com](mailto:sposen@dbsnynj.com); Dafney Stokes <[dstokes@wongfleming.com](mailto:dstokes@wongfleming.com)>; Tabitha Luc <[tluc@wongfleming.com](mailto:tluc@wongfleming.com)>  
**Subject:** KeyBank v. Direct Building

Good morning Mr. Gopstein,

My name is Danielle Pierre and I am an Associate here with Wong Fleming. My understanding is that you corresponded previously with our Partner, Dafney Stokes. First, to confirm, do you still represent Direct Building Products Corp.? And also, do you serve as counsel to GPX Building Products, LLC?

I am reaching out today because, as you are aware, we were unable to come to a resolution of this matter and KeyBank remains interested in pursuing collection. To that aim, we initially sent out Notices of Deposition to the parties in this matter, including GPX Building Products, as they were the party making payments on the accounts for a time. Understanding that this is the holiday season, I would like to request from you dates and times you and your clients are available for post-judgment debtor's examinations. Please let me know some dates of availability. I can be reached via email or at your office at (609) 951-9520.

Thank you,  
Danielle



Danielle Pierre | Associate | Wong Fleming

---

821 Alexander Road, Suite 200 | Princeton, NJ 08540  
Phone: 609.951.9520 | Fax: 609.951.0270

---

[www.wongfleming.com](http://www.wongfleming.com)

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (a) avoiding penalties under the Internal Revenue Code or (b) promoting, marketing or recommending to another party any transaction or matter addressed herein.

THIS ELECTRONIC MAIL TRANSMISSION AND ANY ATTACHMENTS MAY CONTAIN PRIVILEGED, CONFIDENTIAL, OR PROPRIETARY INFORMATION INTENDED ONLY FOR THE PERSON(S) NAMED. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT OR THE AUTHORIZED REPRESENTATIVE OF THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISTRIBUTION, COPYING, OR DISCLOSURE OF THIS COMMUNICATION IS STRICTLY PROHIBITED

AO 451 (Rev. 12/12) Clerk's Certification of a Judgment to be Registered in Another District

UNITED STATES DISTRICT COURT

for the

Southern District of New York

KeyBank National Association

Plaintiff

v.

Direct Building Products Corp. and Yoel Deen

Defendant

Civil Action No. 20-cv-559

CLERK'S CERTIFICATION OF A JUDGMENT TO BE REGISTERED IN ANOTHER DISTRICT

I certify that the attached judgment is a copy of a judgment entered by this court on (date) 07/02/2020.

I also certify that, as appears from this court's records, no motion listed in Fed. R. App. P. 4(a)(4)(A) is pending before this court, the time for appeal has expired, and no appeal has been filed or, if one was filed, it is no longer pending.

Date:

9/8/2020

CLERK OF COURT

Andrew J. Epstein

Signature of Clerk or Deputy Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KEYBANK NATIONAL ASSOCIATION,

Plaintiff,

v.

DIRECT BUILDING PRODUCTS CORP.,  
and YOEL DEEN,

Defendants.

Civil Action No.: 1:20-cv-559-ER

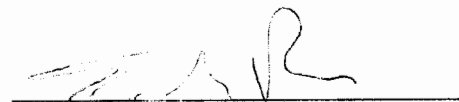
**ORDER FOR DEFAULT JUDGMENT  
AGAINST DEFENDANTS DIRECT  
BUILDING PRODUCTS CORP., AND  
YOEL DEEN**

This action having been commenced on January 23, 2020, by the filing of the Summons and Complaint, and a copy of the Summons and Complaint having been served upon Defendants Direct Building Products Corp., and Yoel Deen, on February 18, 2020, and proof of service thereof having been filed thereafter with the Court, and Defendants having not answered the Complaint and the time for answering having expired, it is:

**ORDERED, ADJUDGED, AND DECREED:** That the Plaintiff have judgment against Defendants Direct Building Products Corp., and Yoel Deen, in the amount of \$514,568.51, plus statutory post-judgment interest.

Dated: July 2, 2020

So Ordered.



Hon. Edgardo Ramos, U.S.D.J.